

POWER & ASSOCIATES, P.C.

By: Michael Power, Esquire

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Attorney for Debtor, Michele Freeman

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

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<b>In Re:</b>	:	<b>Chapter 13</b>
<b>Michele Freeman fna Michele</b>	:	<b>CASE NO. 17-18265 (MBK)</b>
<b>Salmonese fna Michele Freeman</b>	:	
<b>Salmonese dba Industrial Steam Cleaning:</b>	:	
<b>of N.J., LLC dba Industrial Steam</b>	:	
<b>Cleaning of New Jersey</b>	:	<b>Judge: Michael B. Kaplan</b>
 <b>Debtor.</b>	:	
	:	<b>Hearing Date: February 6, 2018 at 10:00</b>
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**CERTIFICATION IN OPPOSITION TO MOTION OF DITECH FINANCIAL LLC FOR  
RELIEF FROM THE AUTOMATIC STAY**

I, Michael Power, Esq., of full age, being duly sworn according to law upon my oath,  
depose and say:

1. I am an attorney-at-law in the State of New Jersey and I am fully familiar with the facts of this matter. I have represented the debtor since the commencement of this action.
2. I have discussed the motion for relief with the debtor and debtor advises she intends to cure all post-petition arrearages owed the movant by the return date of plaintiff's motion for relief.

3. Debtor further intends to file a feasible and confirmable Chapter 13 Plan in advance of the confirmation date of February 13, 2018.

4. As such, plaintiff requests that movant's motion for relief from the automatic stay be denied.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

POWER & ASSOCIATES, P.C.

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**Debtor.** :  
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**ORDER**

AND NOW, this \_\_\_\_ day of February, 2018, upon Movant's Motion for Relief and  
Debtor's Opposition to such motion, it is hereby ordered that the motion is denied.

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Michael B. Kaplan  
U.S. Bk. Judge

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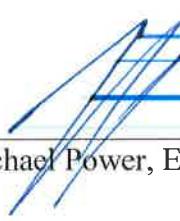
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**CERTIFICATE OF SERVICE**

I, Michael Power, do hereby certify that I have served a copy of Debtor's response in opposition to motion for relief to the following individual via electronic mail and first class mail, postage prepaid:

Brian C. Nicholas, Esquire  
KML Law Group, P.C.  
216 Haddon Avenue, Ste. 406  
Westmont, NJ 08108

Albert Russo  
Standing Chapter 13 Trustee  
CN 4853  
Trenton, NJ 08650-4853

  
Michael Power, Esq.